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January 31, 2022

VIA ECF

Honorable Mark Falk, U.S.M.J. (ret.)
Walsh Pizzi O'Reilly Falanga LLP
Three Gateway Center
100 Mulberry Street, 15th Floor
Newark, New Jersey 07102

Re: Ameritas Life Ins. Corp. v. Wilmington Trust, N.A., USDCNJ no. 2:19-cv-18713

Dear Judge Falk:

We write on behalf of Ameritas Life Insurance Corp. to apprise your Honor of additional outstanding discovery disputes with respect to three non-party subpoenas and to seek your Honor's direction as to how to properly place them before you.

In addition to Life Equity's continuing disregard of Magistrate Judge Kiel's December 1, 2021 order, Ameritas requires assistance to compel the appearance at deposition of Yeeshie Steiner pursuant to subpoena and production of documents by EEA Life Settlements, Inc., also pursuant to subpoena.

Judge Kiel's Courtroom Deputy has advised that all discovery disputes should be directed to the Special Discovery Master. Accordingly, Ameritas seeks guidance as to how your Honor would like these issues to be presented for disposition.

We appreciate your Honor's time and attention to this matter.

Respectfully submitted,

FisherBroyles, LLP



Robert P. Lesko, Partner

Cc: Katherine Skeele, Esq.